



September 30, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Proposed Rule -- Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, published July 17, 2015

Dear Ms. Dortch:

Social Interest Solutions is a California-based national non-profit technology and policy organization focused on improving enrollment and retention in public and private health and social services programs by reforming and modernizing systems and processes. Nearly 22 million Americans have leveraged SIS's web-based eligibility and enrollment systems to connect to needed health and social services.

In the current age, access to both affordable phone service and broadband service is crucial for all individuals and families, including low-income persons, to connect to health, education, job training, nutrition assistance, housing, and other programs and services. While many of these programs and services are accessible by phone, they are also increasingly available through online sources, such as healthcare.gov.

The Federal Communications Commission's (FCC) proposed rule *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund* (referred to as the "proposed rule" hereafter) addresses the changing technology access needs described above. Given Social Interest Solutions' mission to improve access to health and human services through technology and policy solutions, we support the FCC's efforts to reform and modernize the Lifeline program. Our recommendations in response to the proposed rule are as follows:

Diversify Lifeline service options, including the addition of broadband service. To accommodate both increased and varying technology access needs, we recommend Lifeline offer these services at minimum:

- **Continue offering voice service subsidy (for landlines and/or mobile phones).**
 - Allow for more than one subscription per household for mobile phones, given the norm for each person rather than each household to have a mobile phone.¹
- **Add wireline (home) broadband service subsidy, paired with modem and wireless router supply and installation.**

¹ 64% of all American adults own a smartphone. 50% of American adults with a household income under \$30,000 a year own a smartphone. Aaron Smith, "U.S. Smartphone Use in 2015 – Chapter 1: A Portrait of Smartphone Ownership," Pew Research Center, April 1, 2015, <http://www.pewinternet.org/2015/04/01/chapter-one-a-portrait-of-smartphone-ownership/>.

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- In addition to an ongoing broadband service subsidy, also provide a one-time add-on service for modem and wireless router supply and installation for households that request it. The wireless router supply and installation is especially crucial for students' access to broadband, who may be borrowing Wi-Fi capable laptops or tablets from schools and other initiatives working to close the "homework gap", an issue noted in the proposed rule.
- **Add wireless (mobile) data service subsidy to facilitate Internet access through smartphones.**
 - While expanding access to broadband is critical, we also recommend helping low-income individuals and families gain or maintain Internet access through smartphones as well. Smartphone users across all income levels are increasingly using their smartphones to do more than just communicate with others; they also use their smartphone Internet access look up information on jobs, government services and information, and information about health conditions.²
- **Allow for a consumer or his/her household to choose any combination of the above services.**
 - Consumers have different technological needs, so this arrangement would allow consumers to choose the kinds of technology access that best suit their needs. For example, an elderly person may only need to maintain a wireline phone, while a family with school-aged children may need to maintain multiple mobile phones, a wireline phone, and wireless Broadband access.

While this expanded list of Lifeline services would likely require more program funding and administration, all of the aforementioned services are critical for access to information and resources that meet individuals' needs, and therefore it is advised that none be left out. As a suggestion, savings reaped from program innovations that increase efficiencies as well as further standardization to prevent program waste, fraud, and abuse could be diverted to funding this more comprehensive set of services.

Establish a national Lifeline eligibility verifier as suggested in the proposed rule. Such a national verifier would greatly streamline the eligibility process for the Lifeline program. In our vision for the national verifier, the technology solution that would support the national verifier's eligibility process would gather only the minimum amount of needed information from an applicant and then "talk" to the various systems that can help assess the applicant's eligibility. A business rules engine would automate calculations and steps in the eligibility process and deliver the results as appropriate. A neutral third party would staff the necessary manual tasks that accompany the national verifier's eligibility process, including but not limited to processing paper applications, performing reviews of supporting documentation, and operating a call center. Here is an example of the logical flow the national verifier's eligibility process could take:

- After the applicant enters basic identifying information, the technology solution performs an automated search of the National Lifeline Accountability Database (NLAD) to determine if the applicant's household has already met the limit of Lifeline subscriptions.
- If yes, the applicant is provided information on his/her household's existing Lifeline subscription(s) and how to cancel extraneous subscriptions. If no, the technology solution next determines if the applicant or anyone in his/her household receives other public benefits that qualify for Lifeline eligibility.

² Aaron Smith, "U.S. Smartphone Use in 2015," Pew Research Center, April 1, 2015, <http://www.pewinternet.org/2015/04/01/us-smartphone-use-in-2015/>.

- If yes, the applicant is approved for Lifeline. If no, or the applicant does not indicate that he/she or anyone else in the household receives any qualifying benefits, the technology solution will next request household income information from the applicant to determine if the applicant's household meets the Lifeline program's income requirement.
- If the applicant's household meets income requirements, the applicant is approved for Lifeline. If approved, the applicant is notified of his/her eligibility for Lifeline as well as given information on how to obtain Lifeline subsidies.
- If the applicant does not meet program requirements, the applicant is notified of his/her ineligibility for Lifeline and provided information on how to appeal an eligibility denial.

This basic flow could be accomplished through a variety of technology solutions. Below is one possible approach for accomplishing the flow described above in a way that prioritizes applicant convenience as well as program efficiency and accuracy:

- **An applicant applies through their preferred physical site of application:**
 - **Eligible Telecommunications Carriers (ETCs):** ETCs could continue using their electronic applications (or continue using their paper applications as a back-up option for users who prefer to use a paper application), provided the application format meets the FCC's standards. ETCs can also instead use the national verifier's electronic application (or the national verifier's paper application as a back-up option for users who prefer to use a paper application). All applications are submitted electronically or by mail or fax to the national verifier and processed by the national verifier.
 - Please note that ETCs would *not* be determining eligibility or receiving supporting documentation to review; they would instead be acting as a physical application site. For example, an ETC could accomplish this through a kiosk with a computer and document scanner to support electronic applications. If an applicant requests application assistance and the ETC wishes to offer this assistance, they may do so provided they protect the confidentiality of applicants' Personally Identifiable Information (PII). ETCs could be incentivized to participate in this way by being notified, with an applicant's consent, when an applicant that applied through their physical site has been deemed eligible; this would provide the ETC an opportunity to reach out to the applicant with more information about the ETC's phone and broadband services.
 - **Standalone user interface:** This option could be utilized by community outreach workers or applicants who wish to complete an application independently. They would use the national verifier's electronic application located on a designated website, or the national verifier's paper application as a back-up option for users who prefer to use a paper application (available for download at the national verifier's website). All applications are submitted electronically or by mail or fax to the national verifier and processed by the national verifier.
- **The national verifier searches for the applicant's household in the NLAD.** The national verifier requests information from the applicant in order to perform a search for his/her household in the National Lifeline Accountability Database (NLAD) to determine if the applicant's household has already met the limit of Lifeline subscriptions.

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- **If the applicant's household clears a search in the NLAD, the applicant's household is checked against applicable stage agency databases for active benefits cases that qualify for Lifeline eligibility.** The national verifier provides a list of other public benefits that qualify for Lifeline eligibility and asks the applicant if he/she or anyone else in his/her household receives any of those benefits. The national verifier then checks with state agencies that administer the public benefits programs the applicant indicated to determine if the applicant or anyone in his/her household does receive those benefits.
 - Ideally, the national verifier would be able to check for most if not every type of qualifying benefit electronically; pragmatically, especially in early implementation of the national verifier, the national verifier would be able to at least check for SNAP, TANF, and Medicaid electronically, since they are the largest public assistance programs with the most participants. The FCC and the Universal Service Administrative Company (USAC) could provide state agencies the opportunity to voluntarily connect to and interface with the national verifier for this purpose.
 - To the greatest extent possible, the national verifier would have the ability to perform this check on an automated basis. Alternatively, an eligibility worker from the national verifier would perform a manual check in a database or request verifying information from the appropriate state agency that administers said program. As needed, applicants would have the option to scan and submit supporting documentation to the national verifier that prove their participation in a qualifying program. If the national verifier cannot verify that the applicant or anyone in the household receives the other benefits the applicant indicated, the applicant can also opt to instead provide his/her household's income information.
- **If no one in the applicant's household receives any benefits that qualify for Lifeline eligibility, the applicant's household income is checked for eligibility.** The national verifier requests household income information from the applicant to determine if the applicant's household income is within the Lifeline program's eligibility limit. If possible, the national verifier would be able to utilize electronic data sources to verify a household's income automatically. If this is not possible, the applicant can upload or otherwise submit any supporting documentation to the national verifier.
- **Applicants receive their eligibility determination results.**
 - For electronic applications that do not require any supporting documentation, applicants may be able to receive an eligibility determination immediately. Processing times will be slower for paper applications or electronic applications that require the national verifier to check supporting documentation.
 - In cases where an applicant's household has already met its Lifeline subscription/s limit, the applicant could receive from the national verifier information on the existing subscription/s, rules on the limit of subscriptions per household, and instructions on how to cancel extraneous subscriptions. If a household has only reached its subscription limit on phone service, however, the applicant could also be notified that they are still eligible for broadband services, and vice versa.
 - State agencies that administer other Lifeline-qualifying programs such as Medicaid or SNAP that are interested in promoting Lifeline could provide their clients notification that they are eligible for Lifeline along with their eligibility determination results for the Lifeline-qualifying programs. The

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Commission could support such an effort by developing materials that state agencies could share with their clients, such as text inserts for approval notices or pop-ups for web applications that might provide a link to a Lifeline application. We encourage the Commission to seek input from these state agencies about what materials and messages would work best for their client base.

An example of a technology solution that serves a similar purpose is Social Interest Solutions' One-e-App. One-e-App is able to streamline the application process for multiple public benefits programs into one user-friendly electronic application that collects and stores information, screens and delivers data electronically, and helps families enroll in multiple programs. This tool is utilized by multiple county and state health and social service agencies. By serving as a conduit between various data sources, One-e-App is able to take multiple streams of communication and orchestrate them into one application and a consolidated view of program eligibility for the applicant. This simplification of a complex process increases efficiencies for agencies and their clients. One-e-App demonstrates that a technology solution like the one proposed for the national verifier exists and can be readily deployed for the Lifeline program.

This kind of technology solution does not create an entirely new system, but instead harnesses several different existing data sources. In addition to requiring less new infrastructure to be built, this approach to application design and eligibility determination also decreases opportunities for applicants' PII to be exposed and put at-risk, as applicants provide only the information needed for their circumstances. The success of such a solution does require a certain level of coordination among several entities, however; to ensure that the national verifier's technology solution is able to be feasibly implemented, we recommend the FCC also consider the following:

- **Existing data sharing agreements and infrastructure used to administer Lifeline should be capitalized upon whenever possible.**
 - For example, FNS and the FCC have an existing data sharing agreement in which state SNAP agencies can confirm for an ETC if a person is receiving SNAP benefits with a simple "yes/no" answer. The national verifier could build off of this data sharing agreement.
 - If a state has created its own single entity for Lifeline eligibility verification that performs the functions proposed for the national verifier, we recommend that the state be able to continue so long as they check for dual enrollment in the NLAD. The FCC has noted the success of state Lifeline agencies. If these entities are able to perform successfully and states are able to finance their administration, there is no reason to replace them. Moreover, it will take several years to implement a national verifier; such entities could share their expertise with the national verifier as it is being built.
- **The national verifier would ideally have state agencies volunteering to connect to the national verifier, but not all state agencies may be ready and/or willing to do so. State agencies that are deterred because of cost may be encouraged in these ways:**
 - States have significantly modernized their Medicaid technologies using enhanced funding under the Affordable Care Act. Federal agencies have clarified that these Medicaid enhancements can also be used for other programs without having to allocate shared

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development costs to the other programs.³ As a result, states may be able to leverage their Medicaid infrastructure to connect to the national verifier at little or no additional cost.

- State agencies benefit when their clients have phone service and broadband access. Many state human services and health agencies operate call centers, online applications, and online account management services that they promote to clients to help reduce the use of local offices. With cell phones and broadband access, more low-income persons would be able to access these services at their own convenience. Clients having their own mobile phones and broadband access also may make the clients more available for the state agencies when they reach out for interviews or need follow-up information from applications.
- Per the Center on Budget and Policy Priorities, currently the Lifeline program appears to reach only a quarter of the 50 million households that are eligible for Lifeline benefits and an estimated three-quarters of those eligible for Lifeline are enrolled in SNAP and/or Medicaid.⁴ State agencies would likely prefer to build a simple electronic interface to confirm eligibility rather than have their clients flood local offices and call centers with requests for documentation of their enrollment. Many state agencies are working on ways to reduce the traffic in local offices. The national verifier would support that effort.
- **As the FCC and USAC did with the implementation of the NLAD, we recommend that a national verifier be phased in over time as well, starting with just a few states.** Once it has proven successful at a smaller level of implementation, the national verifier could then be expanded to its intended national scope. As mentioned previously, states that have already created their own Lifeline eligibility verification entities could share their expertise throughout to ensure a successful national verifier is developed and implemented.

These recommendations, if implemented, would at minimum promote access to critical technology services subsidized by Lifeline to low-income individuals and families, make it easier to apply for them more easily and conveniently, and ensure that they receive eligibility determinations that are consistent, fair, and accurate. Further positive outcomes would also include but not be limited to providing standardized information about Lifeline subscription limits and rules, increasing awareness of the Lifeline program amongst potential consumers that would most benefit from Lifeline services, and providing opportunities for cost savings and greater efficiencies among state agencies and the public benefits programs they administer.

Thank you for your consideration of these recommendations. Please contact Hilary Dockray at HDockray@socialinterest.org for any follow-up.

Sincerely,



Terri Shaw
Director of Policy
Social Interest Solutions

³ Letter from Center for Medicare and Medicaid Services, July 20, 2015, <http://www.medicaid.gov/federal-policy-guidance/downloads/SMD072015.pdf>.

⁴ Conversation with Center on Budget and Policy Priorities, September 29, 2015.